

Message

From: Payton, Richard [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B05F3A57A2C24A16AF33518E56451BF7-PAYTON, RICHARD]
Sent: 8/19/2014 2:57:51 PM
To: Gordon Pierce [Gordon.Pierce@dphe.state.co.us]
Subject: Review of Colorado 2015 PPA

Gordon:

I am reviewing your draft PPA for FY2015. 2 Items probably need update; since I was redlining, a few other edits you could take or leave. In the workplan, the five-year network assessment said "NA this year." I redlined to read "Submit by July 1, 2015."

Elsewhere, I clarified "Modify and update EPA AQS System." To "Modify and update CDPHE data in EPA AQS System, and added the annual July 1 due date for flags and initial descriptions in AQS for exceptional events. These last 2 are just clarifications, not mandatory as far as I am concerned. Let me know if you would rather leave those two alone. I presume the network assessment change will be acceptable.

NEEDED:

TECHNICAL SERVICES PROGRAM -- MONITORING, EMISSION INVENTORIES, MODELING, PRESCRIBED FIRE		
1.29 Monitor Air Quality	Per CFR Schedule, submit all ambient criteria pollutant data to the Air Quality System (AQS).	Ongoing
	Per the Exchange Network requirements for regulatory and national system reporting, submit XML-formatted AQS data.	NEIEN grant participation is ongoing.
	Implement ambient air monitoring program in accordance with 40 CFR Part 58.	Ongoing
	Submit five-year Network Assessment.	N/A this year. Last submitted by July 1, 2010-2015 deadline.

OPTIONAL:

Modify and update <u>CDPHE data</u> in EPA AQS System.	Ongoing
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Program Strategy	Activity	Milestone/Measure
	Maintain awareness of new requirements for Exceptional Events. Flag data in AQS related to natural and exceptional events. Develop and submit documentation to EPA.	Ongoing. Calendar year flags and initial event descriptions in AQS by July 1 of the following year. Development and submittal of exceptional event documents is ongoing.

In the PPA Narrative for Chapter 4, I just found an apparent typo on page 2, where an ozone NAAQS change in 2007 is mentioned; I believe it is referring to the 1997 8-hour NAAQS.

NEEDED?

4.5 Air Quality Environmental Conditions

4.5.1 NAAQS

Colorado became the first state in the nation to come into attainment with all the national ambient air quality standards. That milestone was reached in 2002, and since that time trends in ambient air quality have continued to improve. However, with a stricter ozone standard established by the EPA in ~~2007~~1997, and unfavorable meteorological conditions for several years, the Denver and North Front Range area was designated by EPA as a non-attainment area for ozone in 2007. An even stricter ozone standard set in 2008 has resulted in more ozone violations.

Colorado developed an ozone action plan and state implementation plan (SIP) revision to meet the 1997 standard, the most recent of which was submitted to the EPA on June 18, 2009 and partially approved by the EPA on August 5, 2011. The plan placed new emission controls on the oil and gas industry and expanded the motor vehicle emissions testing program to the North Front Range to include Fort Collins, Greeley and nearby areas. Colorado is in the process of evaluating its ozone action plan and SIP to ensure it will meet the stricter requirements of the 2008 standard. Colorado was designated by the EPA as a marginal nonattainment area for the 2008 ozone standard effective July 20, 2012 and must show attainment of the standard by 2015.

I will give you a call and talk these over before passing along any changes for entry into MAX.

Richard
(303) 312-6439